



Farzie Shelton, ChE; REM
Associate GM Technical Support

CERTIFIED MAIL

RECEIVED

JUN 22 2009

June 17, 2009

BUREAU OF AIR REGULATION

Mr. Jeff Koerner, P.E.
Administrator for New Source Review
Bureau of Air Regulation
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Coal Yard Improvements Construction Permit #1050004-024-AC
C.D. McIntosh, Jr. Power Plant – facility ID #1050004

File # 1050004-025-AC

Dear Mr. Koerner:

On September 28, 2008, Lakeland Electric (LE) received the above referenced construction permit to make improvements to its C.D. McIntosh, Jr. Power Plant's coal handling and transfer system. Due to a delay in beginning construction and upon further review of the engineering design rates for the system, LE is submitting this request to amend its construction permit

The coal transfer system was originally designed with a 400 tons/hr operating limit, which allows McIntosh's conveying system to convey the coal to its stack-out pad without backup. After further design review, LE's engineering department determined that at times the unloading rate of the conveying system may require a maximum speed of 650 tons/hr to handle coal received in McIntosh at various times by different delivery methods such as train or truck. Although we are requesting an increase in the conveying rate on an hourly basis, there would be no change in our annual coal handling activities. Therefore, this is merely a revision of the designed operating rate of the system and not an increase in the annual amount of coal conveyed through the system which was already permitted. None of the requested changes in this amendment will increase annual emissions submitted in the earlier application, and therefore, LE does not believe an additional application is required.

Therefore, with this letter we request the following two conditions to be eliminated from our permit. However, if the Department should decide that such conditions have to remain in the permit, then we request the following changes in the hourly and daily tonnages.

1. S.C. B.3: The maximum allowable operating rate for the conveying and stackout facilities is 400 650 tons/hr.
2. S.C. A.2: The maximum unloading rate is 9600 15,600 tons/day.

City of Lakeland • Department of Electric Utilities

501 East Lemon Street • Lakeland, FL 33801-5050 • 863. 834.6603 • Fax 863. 834.8187 • Cell 863.430.8297

farzie.shelton@lakelandelectric.com

Page 1 of 2

Mr. Jeff Koerner, P.E.
Administrator for New Source Review
Bureau of Air Regulation
June 17, 2009

In addition, we request that the expiration date of the construction permit be extended to December 31, 2011, as construction of the proposed project has been delayed due to the Unit No. 3 extended outage for installation of the SCR.

As always, we appreciate if you would process our request at your earliest convenience. Enclosed with this letter, please find a Certification Page signed by LE's Authorized Representative, Mr. Timothy Bachand. If you have any questions, please do not hesitate to contact me.

Sincerely,

P.P.



Farzie Shelton

Enclosure: A.R. Certification (T. Bachand)

City of Lakeland • Department of Electric Utilities

501 East Lemon Street • Lakeland, FL 33801-5050 • 863. 834.6603 • Fax 863. 834.8187 • Cell 863.430.8297

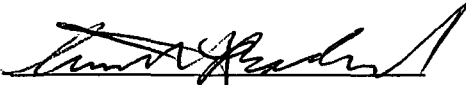
farzie.shelton@lakelandelectric.com

Page 2 of 2

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Mr. Timothy Bachand, P.E., Manager of Engineering
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Lakeland Electric Street Address: 501 E. Lemon Street City: Lakeland State: FL Zip Code: 33801-5079
3. Owner/Authorized Representative Telephone Numbers... Telephone: (863) 834 - 6633 ext. N/A Fax: (863) 834 - 5670
4. Owner/Authorized Representative E-mail Address: timothy.bachand@lakelandelectric.com
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i> Subject: C.D. McIntosh, Jr. Power Plant Coal Yard Improvements  Signature <u>6/19/09</u> Date